MOOREBANK PARK WEST – SSD 5066

INDEPENDENT AUDIT PROGRAM

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1. Introduction

The Moorebank Precinct West Stage 1 (the Project) is part of the broader Moorebank Intermodal Terminal development. The development involves the construction and operation of intermodal freight terminal facilities at Moorebank in south-west Sydney, linked to Port Botany and the interstate rail network.

The Project site is centred on an approximately 220 hectare area of Commonwealth-owned land, which is adjacent to the Southern Sydney Freight Line, the East Hills Rail Line, the M5 Motorway and Moorebank Avenue (as depicted in Figure 1).

The Project is a staged development, requiring a number of development consents over its duration. Consent was granted for the Concept Proposal and Early Works (Stage 1) for the Project under section 89E of the *Environmental Planning and Assessment Act 1979* on 3 June 2016 (State Significant Development 5066) subject to a number of conditions.

The approved Concept Proposal involved the use of the site as an intermodal facility, including a rail link to the Southern Sydney Freight Line, warehouse and distribution facilities, and associated works.

The approval for Early Works (Stage 1) involved the following works to the west of Moorebank Avenue:

- Demolition of buildings, including services termination and diversion
- Rehabilitation of the excavation/earthmoving training area
- Remediation of contaminated land
- Removal of underground storage tanks
- Heritage impact remediation works; and
- The establishment of construction facilities and access, including site security.

Early works construction commenced in March 2017. Demolition is now complete and project continues to undertake housekeeping, site establishment for new compounds, remediation and rehabilitation.

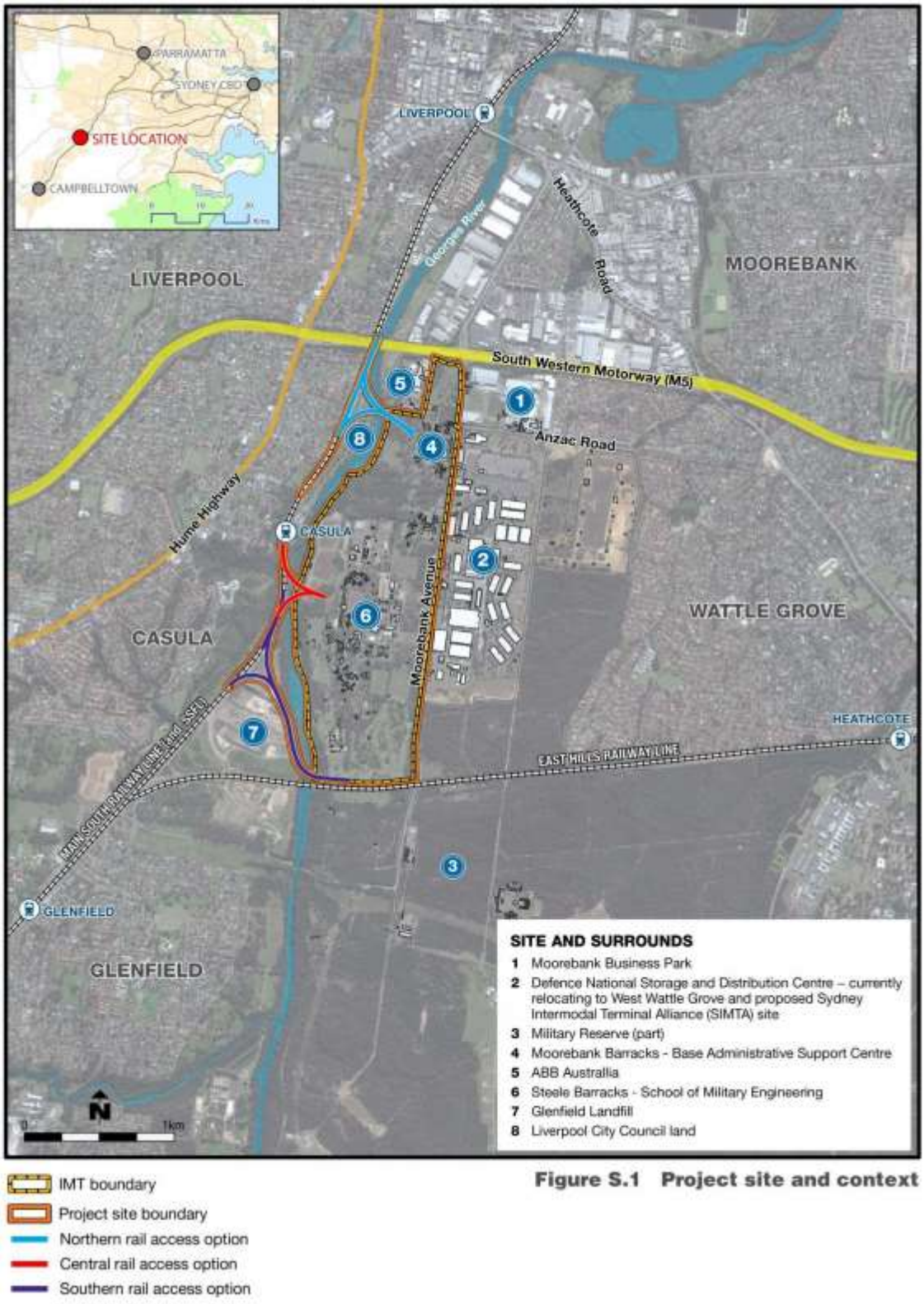

Figure S.1 Project site and context

Figure 1: Project location (Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, 2014)

2. Context, purpose and scope

2.1 Context

2.1.1 Condition of Consent

State Significant Development (SSD) 5066 Schedule 3, Condition of Consent (CoC) A2(d) requires that:

*The Applicant shall prepare and implement a **Compliance Tracking Program**, to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary prior to the commencement of construction and operate for the duration of the Early Works stage.*

The Program shall include, but not be limited to:

…

(d) a program for independent environmental auditing in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems

…

2.1.2 The IAPAR

In 2018, the Department of Planning and Environment (the Department) released an Independent Audit guideline document entitled *Independent Audit Post Approval Requirements* (IAPAR). This document sets out information required to be presented in Independent Audit Programs as follows:

- an "Audit Schedule" which is a schedule of Independent Audits that are to be undertaken and reported to the Department during the carrying out of the development; and
- an "Audit Table" which sets out the matters to be audited in each Independent Audit listed in the Audit Schedule.

2.2 Purpose and scope

Independent Audits carried out on the Project between March 2017 and June 2019 were managed under a separate Independent Audit Program managed by the demolition contractor. With that scope of works now complete, an new Independent Audit Program is required.

This Independent Audit Program has been developed for the Project in accordance with SSD 5066 Schedule 3

The Project, having been granted consent in 2016, is not required to comply with the requirements of the IAPAR. However, for the sake of consistency and continuity with likely conditions within future consents, the Project has voluntarily elected to align its approach to Independent Audits with the IAPAR where appropriate, in addition to complying with *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*, as required by CoC A2(d).

3. Audit schedule

Neither the CoC for the Concept Plan and Early Works (Stage 1) nor the *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems* (to which CoC A2(d) refers) specify the frequency of audits required.

The IAPAR states that the frequency of audits in the Audit Schedule must comply with any specific requirements in the CoC. If the specific frequency of Independent Audits is not stated in the CoC, Independent Audits must be undertaken at least as frequently as detailed in Table 1 of the IAPAR, for the phases that apply to the development.

Table 1 presents the schedule of Independent Audits that are to be undertaken during the carrying out of the development, in accordance with the IAPAR.

Table 1: Schedule of Independent Audits

Phase of works	Audit	Timing[1,2]	Anticipated date of completion of the Audit[3]
Construction	Construction Independent Audit 1	Within eight weeks of the notified date of commencement of construction. *Acknowledging that the Project has been in construction since 2017, this establishes a new schedule following completion of demolition works.*	15 August 2019
	Construction Independent Audit 2	Within six months from the date of the initial construction Independent Audit	15 February 2020
	Construction Independent Audit 3 onwards	At intervals no greater than 52 weeks from the date of the initial Independent Audit	15 August 2020 and annually thereafter until commencement of operations
Operation	Operational Independent Audit 1[1]	Within 1 year of the commencement of operations	To be determined
	Ongoing Operational Independent Audits	At intervals no great than 3 years	To be determined

Notes:

1. The IAPAR states that in circumstances where both construction and operation phases of a development are being carried out at the same time in respect of different parts of a development, only one initial independent audit is required for the commencement of construction, and another at the commencement of operation. It is not necessary to carry out initial independent audits of the commencement of construction and operation of each stage of the development.
2. The IAPAR states that the frequency of auditing that subsequently applies after the initial Independent Audit is that which is applicable to the phase of the development being carried out, for example, at least every 26 or 52 weeks for the construction phases, but every 3 years for the operational phases.
3. The IAPAR states that the timing relates to the completion of all activities required in an Independent Audit, including scope development, undertaking the audit and submitting a final Audit Report (including the proponent's response to audit findings).

4. Audit table

The IAPAR requires that the Audit Table contain all requirements from CoC, environmental licences (excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*), permits or approvals, that must be complied with (if any).

The IAPAR further requires that the Audit Table must also set out the following information for each requirement to be complied with (compliance requirement):

- a unique identification number
- the exact wording of the compliance requirement;
- a blank column to record the evidence used to assess and determine whether each requirement has been complied with
- a blank column for commentary on findings and recommendations; and
- a blank column for recording the status of compliance.

The Audit Table is presented in Appendix A. For the purposes of the Project, we have adopted the approach that the Audit Table would comprise the CoCs from Schedule 3 of SSD 5066.

A separate Audit Table would be also developed prior to each Independent Audit, comprising of select mitigation measures and commitments from the Project's Construction Environmental Management Plans and Sub-Plans required under the consent.

Whilst the Project holds a Commonwealth Approval under the *Environment Protection and Biodiversity Conservation Act 1999*, auditing of the document does not form part of this Independent Audit Program, as the Department of the Environment and Energy has its own mechanism for initiating and undertaking audits.

5. Independence of auditors

Section 3.1.2 of the IAPAR requires that any work, other than that within the audit scope, performed by the auditor or any technical specialist (or other employees of the companies that they are employed by), in respect of an audited Project or a proponent must be declared to the Department in writing. The declaration must be emailed to the Department (compliance@planning.nsw.gov.au) by the proponent as part of the submission seeking agreement to the auditor.

SSD 5066 does not impose this requirement. Regardless, WolfPeak provides the declarations in accordance with the Department's *Independent Audit Declaration Form* appended to the IAPAR in Appendix B.

6. Independent audits

In accordance with CoC A2(d), the Applicant must implement the Compliance Tracking Program, including a program for independent environmental auditing in accordance with *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems.*

The Independent Audits will be conducted in a manner consistent with *AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems*, this Independent Audit Program and in general accordance with the methodologies and reporting requirements set out in the Department's lAPAR.

To note the IAPAR requires consultation with interested State Agencies and the Community Consultation Committee (if one is required under the consent) on the scope of each Independent Audit. This does not form part of the methodology for the Independent Audit of the Project.

The IAPAR also requires the Independent Audit Report, plus a response from the proponent on the findings of each Independent Audit to be submitted to the Department by the dates specified in the audit schedule. This does not form part of the methodology for the Independent Audit of the Project.

Appendix A: Audit Table

SSD 5066 Conditions of Consent

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Schedule 3				
Conditions to be met for Early Works (Stage 1)				
Part A Administrative conditions				
Subject Land				
A1	The land subject to this part relates to the intermodal site (Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707).			
Compliance Monitoring and Tracking				
A2	The Applicant shall prepare and implement a **Compliance Tracking Program,** to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the duration of the Early Works stage. The Program shall include, but not be limited to: (a) provision for the notification to the Secretary prior to the commencement of construction; (b) provision for periodic review of the compliance status of the SSD against the requirements of this approval; (c) provision for periodic reporting of compliance status to the Secretary, including but not limited to: (i) a Pre-Construction Compliance Report prior to the commencement of early works, (ii) Six-monthly, or other timing as agreed by the Secretary, Early Works Compliance Reports, for the duration of early works, and (iii) a Completion Compliance Report within one month of completion of the early works stage; (d) a program for independent environmental auditing in accordance with *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*; (e) mechanisms for recording environmental incidents during construction and actions taken in response to those incidents; (f) provision for reporting environmental incidents to the Secretary during construction, in accordance with conditions A3 and A4; (g) procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(h) provision for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.			
Incident Reporting				
A3	The Applicant shall notify the Secretary and relevant public authorities of any incident with actual or potential significant on-site or off-site impacts on human health or the biophysical environment within 24 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the Secretary within seven days of the date on which the incident occurred. *Note:* • *Where an incident also requires reporting to the EPA and/or OEH, the incident report prepared for the purposes of notifying the EPA and/or OEH would meet this requirement.*			
A4	The Applicant shall meet the requirements of the Secretary or relevant public authority (as determined by the Secretary) to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition A3, within such period as the Secretary may require.			
PART B PRIOR TO CONSTRUCTION				
Demolition				
B1	The Applicant shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601:2001:* The Demolition of Structures, or its latest version.			
Contamination				
B2	The approved works (including any excavation required for remediation) must not occur below 5 metres AHD and lower the watertable below 1m AHD on adjacent class 1, 2, 3, 4 land in accordance with the Liverpool Local Environmental Plan 2008.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B3	The subject site is to be remediated in accordance with: (a) The approved Remedial Action Plan; (b) *State Environmental Planning Policy No. 55 - Remediation of Land;* and (c) The guidelines in force under the *Contaminated Land Management Act.* Amendments to the approved Remedial Action Plan required as a result of further site investigations must be approved by the site auditor, in consultation with the EPA. Within 3 months after the completion of the remediation works, a notice of completion, including a validation and/or monitoring report is to be provided to the Secretary. This notice must be consistent with *State Environmental Planning Policy No. 55 - Remediation of Land.* The validation and/or monitoring report is to be independently audited and a Site Audit Statement Issued. The audit is to be carried out by an independent auditor accredited by the Environment Protection Authority. Any conditions recorded on the Site Audit Statement are to be complied with.			
Soil, Water Quality and Hydrology				
B4	The Early Works shall be undertaken to comply with section 120 of the *Protection of the Environment Operations Act 1997,* which prohibits the pollution of waters.			
B5	All activities taking place in, on or under waterfront land, as defined in the *Water Management Act 2000* should be conducted generally in accordance with the NSW Office of Water's Guidelines for Controlled Activities.			
Heritage				
B6	The Applicant shall not harm, modify or otherwise impact any heritage items outside the subject site.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B7	B7 Prior to the commencement of Early Works affecting Aboriginal sites MA1, MA2, MA3, MA4 , MA5 and MA9, the Applicant shall: (a) develop a detailed salvage strategy, prepared in consultation with the OEH (Aboriginal heritage) and the Aboriginal stakeholders. The investigation program shall be prepared to the satisfaction of the Secretary; and (b) undertake any further archaeological excavation works recommended by the results of the Aboriginal archaeological investigation program. Within twelve months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis and Aboriginal Site Impacts Recording Forms (ASIR), and the identification of final storage location for all Aboriginal objects recovered (testing and salvage), prepared in consultation with the Aboriginal stakeholders, the OEH (Aboriginal heritage) and to the satisfaction of the Secretary. *Note: where archaeological testing has occurred as part of the Environmental Assessment and the results are included in the documents listed in condition 4 the sites tested must still form part of the final report prepared under B7(b).*			
B8	Prior to the commencement of Early Works affecting non-Aboriginal sites MHPAD1 and MHPAD2, the Applicant shall undertake any further archaeological excavation works recommended by the results of the non-Aboriginal archaeological investigation program. Within 12 months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis, and the identification of a final repository for finds, prepared in consultation with the OEH (Heritage branch) and to the satisfaction of the Secretary. *Note: where archaeological testing has occurred as part of the environmental assessment and the results are included in the documents listed in condition 4, the sites tested must still form part of the methodology and final report prepared for the non-Aboriginal archaeological investigation program.*			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B9	Prior to the commencement of Early Works affecting the CUST Hut, RAAF STRARCH Hangar, the Dog Cemetery and Commemorative Gardens, the Applicant shall prepare a report in consultation with the Heritage Council of NSW, the local Council and the local Historical Society which considers the options for mitigation of these items. In relation to the Dog Cemetery, consultation should also occur with the School of Military Engineering's Explosive Detection Dog's Unit. The report shall include the archival recordings and the historical research, where required, to the Secretary, the Heritage Council of NSW, the local Council and the local Historical Society.			
Dangerous Goods				
B10	Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the *Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin* (Environment Protection Authority, 1997). In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.			
Dust Management				
B11	The Applicant shall carry out all feasible and reasonable measures to minimise dust generated by the Development.			
B12	During Early Works, the Applicant shall ensure that: (a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; and (b) all loaded vehicles entering or leaving the site have their loads covered; and all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.			
Waste Management				
B13	The reuse and/or recycling of waste materials generated on site shall be maximised as far as practicable, to minimise the need for treatment or disposal of those materials off site.			
B14	All liquid and/or non-liquid waste generated on the site shall be assessed and classified in accordance with *Waste Classification Guidelines* (Department of Environment, Climate Change and Water 2009).			
B15	All waste materials removed from the subject site shall only be directed to a waste management facility or premises lawfully permitted to accept the materials.			
Utilities and Services				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B16	Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to construction to determine requirements for access to, diversion, protection, and/or support. Consultation with the relevant owner and/or provider of services that are likely to be affected by the Early Works shall be undertaken to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Applicant, or as otherwise agreed between the parties.			
B17	The Applicant shall prepare dilapidation surveys and reports on the condition of local roads, footpaths, services and utilities affected by Early Works. The Applicant shall carry out rectification work at the Applicant's expense and to the reasonable requirements of the owners for damage resulting from the completion of Early Works.			
B18	The Applicant shall ensure that the construction and operation of the proposed development will not prevent the existing use of Moorebank Avenue as a public road to a standard commensurate to its current use prior to the development. *Note: temporary closures or part closures and changes to operation of Moorebank Ave may occur for limited periods during construction as detailed in the Construction Traffic Management Plan.*			
PART C COMMUNITY INFORMATION AND REPORTING				
Community Communication Strategy				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C1	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a **Community Communication Strategy** to the satisfaction of the Secretary. The Strategy shall provide mechanisms to facilitate communication between the Applicant (and its contractor(s)), the Environmental Representative (see condition D1), the relevant Council and community stakeholders (particularly adjoining landowners) on the design and construction environmental management of the Early Works. The Strategy shall include, but not be limited to: (a) identification of stakeholders to be consulted as part of the Strategy, including affected and adjoining landowners, key community and business groups, and community and social service organisations; (b) procedures and mechanisms for the regular distribution of accessible information to community stakeholders on construction progress and matters associated with environmental management, including provision of information in appropriate community languages; (c) procedures and mechanisms through which the community stakeholders can\ discuss or provide feedback to the Applicant and/or Environmental Representative in relation to the environmental management and delivery of the SSD; (d) procedures and mechanisms through which the Applicant can respond to enquiries or feedback from the community stakeholders in relation to the environmental management and delivery of the SSD; and (e) procedures and mechanisms that would be implemented to resolve issues/ disputes that may arise between parties on the matters relating to environmental management and the delivery of the SSD, including but not limited to disputes regarding rectification or compensation for impacts to third party property and infrastructure. These procedures and mechanisms may include the use of a suitably qualified and experienced independent mediator.			
Complaints and Enquiries Procedure				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C2	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall ensure that the following are available for community enquiries and complaints for the duration of Early Works: (a) a 24 hour telephone number(s) on which complaints and enquiries about the SSD may be registered; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this approval.			
C3	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a **Construction Complaints Management System** consistent with *AS ISO 10002-2006 Customer satisfaction - Guidelines for complaints handling in organisations (ISO 10002:2004, MOD)* and maintain the System for the duration of Early Works and up to 12 months following completion of this stage. Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this approval. The information contained within the System shall be made available to the Secretary on request.			
Provision of Electronic Information				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C4	Prior to commencement of the Early Works, or as otherwise agreed by the Secretary, the Applicant shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the SSD, for the duration of Early Works. The Applicant shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to: (a) information on the current implementation status of the SSD; (b) a copy of the documents listed in condition 4, and any documentation supporting modifications to this approval that may be granted from time to time; (c) a copy of this approval and any future modification to this approval; (d) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the SSD; (e) a copy of each current report, plan, or other document required under this approval; (f) the outcomes of compliance tracking in accordance with condition A2 of this approval; and (g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.			
PART D CONSTRUCTION ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Representative				
D1	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall appoint a suitably qualified and experienced Environmental Representative(s) that is independent of the design and construction personnel, and that has been approved by the Secretary. The Applicant shall employ the Environmental Representative(s) for the duration of construction of this stage, or as otherwise agreed by the Secretary. The Environment Representative(s) shall: (a) be the principal point of advice in relation to the environmental performance of the Early Works; (b) monitor the implementation of environmental management plans and monitoring programs required under this approval and advise the Applicant upon the achievement of these plans/programs; (c) have responsibility for considering, and advising the Applicant on, matters specified in the conditions of this approval, and other licences and approvals related to the environmental performance and impacts of the Early Works;			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(d) ensure that environmental auditing is undertaken in accordance with the Applicant's Environmental Management System(s); (e) be given the authority to approve/reject minor amendments to the Construction Environment Management Plan. What constitutes a "minor" amendment shall be clearly explained in the Construction Environment Management Plan; (f) be given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts; and be consulted in responding to the community concerning the environmental performance of the Early Works where the resolution of points of conflict between the Applicant and the community is required.			
D2	The Environmental Representative shall prepare and submit to the Secretary a three monthly report on the Environmental Representative's actions and decision on matters specified in condition D1 for the preceding month. The reports shall be submitted within seven (7) days for the end of each month for the duration of Early Works, or as otherwise agreed by the Secretary. Notwithstanding, the Environmental Representative shall be given the independence to report to the Secretary at any time and/or at the request of the Secretary.			
Construction Soil and Water Management				
D3	Soil and water management measures consistent with *Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition* (Landcom, 2004) shall be employed during Early Works to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.			
Bunding				
D4	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook.			
Construction Hours				
D5	Early works shall be undertaken during the following standard construction hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; and (b) 8:00am to 1:00pm Saturdays; (c) at no time on Sundays or public holidays.			
D6	Activities resulting in impulsive or tonal noise emissions shall only be undertaken: (a) between the hours of 8:00 am to 5:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	For the purposes of this condition, 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.			
D7	Notwithstanding conditions D5 and D6, works may be undertaken outside the hours specified under those conditions in the following circumstances: (a) construction works that cause $L_{Aeq\ (15\ minute)}$ noise levels that are: (i) No more than 5 dB above rating background level at any residence in accordance with the *Interim Construction Noise Guideline (DECC, 2009); and* (ii) No more than the noise management levels specified in Table 3 of the *Interim Construction Noise Guideline* (DECC, 2009) at other sensitive landuses; or (b) for the delivery of materials required by the police or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or (d) construction works approved through an **Out-Of-Hours Work Protocol** prepared as part of the Construction Noise and Vibration Management Plan required by condition D21(b), provided the relevant Council, local residents and other affected stakeholders and sensitive receivers are informed of the timing and duration at least 48 hours prior to the commencement of the works; or (e) identified works approved by the Secretary.			
Construction Noise and Vibration				
D8	The Applicant shall implement all feasible and reasonable noise mitigation measures with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction noise management levels established using the *Interim Construction Noise Guideline* (DECC 2009); (b) vibration criteria established using the *Assessing Vibration: a Technical Guide* (DECC 2006) (for human exposure); and (c) the vibration limits set out in the *German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures* (for structural damage). Any construction activities identified as exceeding the construction noise management levels and/or vibration criteria shall be managed in accordance with the Construction Noise and Vibration Management Plan required by condition D22(b). *Note:*			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	• *The* Interim Construction Noise Guideline *identifies 'particularly annoying' activities that require the addition of 5dB(A) to the predicted level before comparing to the construction Noise Management Level.*			
Construction Traffic Noise				
D9	The Applicant is to ensure that construction vehicle contractors operate so as to minimise any construction noise impacts from the subject site. Measures that could be used include toolbox talks, contracts that include provisions to deal with unsatisfactory noise performance for the vehicle and/or the operator, and specifying non-tonal movement alarms in place of reversing beepers or alternatives such as reversing cameras and proximity alarms, or a combination of these, where tonal alarms are not mandated by legislation.			
D10	No use of compression brakes shall be permitted for construction vehicles associated with the Early Works in the vicinity of the subject site.			
Transport and Access				
D11	Construction heavy vehicle access to and from the site via Moorebank Avenue (south) / Cambridge Avenue during Early Works is not permitted, with the exception of heavy vehicles travelling to and from the Glenfield Waste Facility.			
D12	The Early Works shall be carried out to, where feasible and reasonable, to avoid the use of local roads (through residential streets) by heavy vehicles to gain access to the site and/or ancillary facilities.			
D13	Construction vehicles (including staff vehicles) associated with the Early Works shall be managed to: (a) minimise parking or queuing on public roads; (b) minimise idling and queuing in local residential streets where practicable; (c) adhere to the nominated haulage routes identified in the Construction Traffic and Access Management Plan required under condition D22(a); and (d) ensure access and egress from construction compounds is undertaken in a safe and lawful manner.			
D14	Safe pedestrian and cyclist access through or around worksites shall be maintained during early works. In circumstances where pedestrian and cyclist access is restricted due to construction activities, a satisfactory alternate route shall be provided and signposted, including provision of permanent footpaths where pedestrian access is reliant on grassed verges.			
D15	Access to all properties affected by the carrying out of Early Works shall be maintained, where feasible and reasonable, unless otherwise agreed by the relevant property owner or occupier. Any access physically affected by the carrying out of Early Works shall be reinstated to at least an equivalent standard, unless agreed with by the property owner.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D16	Upon determining the haulage route(s) for construction vehicles associated with subject site, and prior to Early Works, a suitably qualified and experienced independent expert shall prepare a **Road Dilapidation Report.** The Report shall assess the current condition of roads and describe mechanisms to restore any damage that may result due to its use by traffic and transport related to the Early Works. The Report shall be submitted to the Secretary for information and the relevant Council for review prior to the commencement of haulage. Following completion of Early Works, a subsequent Report shall be prepared to assess any damage to the road that may have resulted. Measures undertaken to restore or reinstate roads affected by the Early Works shall be undertaken in a timely manner, in accordance with the reasonable requirements of the relevant Council, and at the full expense of the Applicant.			
Biodiversity				
D17	Within 12 months of the commencement of Early Works, the Applicant shall develop and implement a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the SSD will be offset. The Package shall be consistent with the *NSW Biodiversity Offsets Policy for Major Projects* (OEH 2014), unless otherwise agreed by the Secretary. The Package shall include, but not necessarily be limited to: (a) the identification of the extent and types of habitat that would be lost or degraded as a result of the final design of the SSD; (b) the objectives and biodiversity outcomes to be achieved; (c) the final suite of the biodiversity offset measures selected and secured in consultation with OEH; (d) the management and monitoring requirements for compensatory habitat works and other biodiversity offset measures proposed to ensure the outcomes of the package are achieved, including: (e) the monitoring of the condition of species and ecological communities at offset (including translocation) locations; (f) the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites; (g) provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; and (h) timing and responsibilities for the implementation of the provisions of the Package.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region. Where monitoring referred to in (e) above indicates that biodiversity outcomes are not being achieved, remedial actions shall be undertaken to ensure that the objectives of the Biodiversity Offset Package are achieved to the satisfaction of the Secretary. Such remedial actions shall be documented under an addendum to the Biodiversity Offset Package and the addendum be submitted for the approval of the Secretary, prior to the implementation of that addendum.			
D18	Subject to future Development Applications, no threatened species or communities can be cleared other than that required for Early Works. Any hollow bearing trees shall be relocated to areas to be determined by a suitably qualified ecologist in areas identified for conservation.			
D19	The Applicant shall prepare and implement a 'Threatened Dragonfly Species Survey Plan' to determine the presence or absence of threatened dragonfly species listed under the *Fisheries Management Act 1994* on the Georges River, adjacent to the development site. The plan, including survey methodology, shall be prepared in consultation with DPI Fisheries prior to the commencement of Early Works. On implementing the plan, the survey results are to be forwarded onto DPI Fisheries. Should threatened dragonfly species be found at this site, DPI Fisheries should be contacted to agree on possible mitigation measures to avoid impacts in accordance with *NSW DPI Policy and Guidelines for Fish Habitat Conservation and Management* (2013).			
Construction Environmental Management Plan				
D20	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP). The CEMP is to be prepared in consultation with the EPA, OEH, DPI Water, DPI Fisheries, and the relevant Council, for the approval of the Secretary. The CEMP shall outline the environmental management practices and procedures that are to be followed during construction. The CEMP is to be prepared in accordance with the *Guideline for the Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources, 2004). The CEMP shall include, but not necessarily be limited to: (a) a description of activities to be undertaken during Early Works; (b) statutory and other obligations that the Applicant is required to fulfil during Early Works, including approvals, consultations and agreements required from authorities and other stakeholders under key legislation and policies;			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(c) a description of the roles and responsibilities for relevant employees involved in the Early Works, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors, are aware of their environmental and compliance obligations under these conditions of approval; (d) an environmental risk analysis to identify the key environmental performance issues associated with the Early Works; and (e) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the CEMP: (i) measures to monitor and manage dust emissions including dust from stockpiles, traffic on unsealed internal roads and materials tracking from construction sites onto public roads; (ii) measures for the handling, treatment and management of hazardous and contaminated materials (including asbestos); (iii) measures to monitor and manage waste generated during construction including but not necessarily limited to: general procedures for waste classification, handling, reuse, and disposal; use of secondary waste material in construction wherever feasible and reasonable; procedures or dealing with green waste including timber and mulch from clearing activities; and measures for reducing demand on water resources (including potential for reuse of treated water from sediment control basins); (iv) measures to monitor and manage hazard and risks; (v) measures to monitor and rectify any impacts to third party property and infrastructure, including details of the process for rectification or compensation of affected landowners, and timeframes for rectification works or compensation processes; and (vi) the issues identified in condition D21. The CEMP shall include procedures for its periodic review and update (including the sub-plans required under condition D21), as necessary (including where minor changes can be approved by the Environmental Representative). The CEMP shall be submitted for the approval of the Secretary no later than one month prior to the commencement of Early Works, or as otherwise agreed by the Secretary. The CEMP may be prepared in stages; however, Early Works shall not commence until written approval of the relevant stage has been received from the Secretary.			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	The approval of a CEMP does not relieve the Applicant of any requirement associated with this approval. If there is an inconsistency with an approved CEMP and the conditions of this approval, the requirements of this approval shall prevail.			
Construction Environmental Management Plan — Sub Plans				
D21	As part of the CEMP for the SSD, the Applicant shall prepare and implement: (a) a **Construction Traffic and Access Management Plan** to ensure traffic and access controls are implemented to avoid or minimise impacts on traffic, pedestrian and cyclist access, and the amenity of the surrounding environment. The Plan shall be developed in consultation with the relevant Council, emergency services, road user groups, and relevant pedestrian and bicycle user groups, and include, but not necessarily be limited to: (i) identification of construction traffic routes and construction traffic volumes (including heavy vehicle/spoil haulage) on these routes; (ii) details of vehicle movements for construction sites and ancillary facilities including parking, dedicated vehicle turning areas, and ingress and egress points; (iii) discussion of construction impacts that could result in disruption of traffic, public transport, pedestrian and cycle access, access to public land, property access, including details of oversize load movements, and the nature and duration of those impacts; (iv) details of management measures to minimise traffic impacts, including temporary road work traffic control measures, onsite vehicle queuing and parking areas and management measures to minimise peak time congestion and measures to ensure safe pedestrian and cycle access; (v) details of measures to prevent construction heavy vehicles from using Moorebank Avenue south and Anzac Road, with the exception of heavy vehicles travelling to and from the Glenfield Waste Facility; (vi) details of measures to maintain or provide alternative safe and accessible routes for pedestrians throughout the duration of construction; (vii) details of measures to maintain connectivity for cyclists, with particular emphasis on providing adequate access between key existing cycle routes for commuter cyclists; (viii) details of measures to manage traffic movements, parking, loading and unloading at ancillary facilities during out-of-hours work; (ix) details of methods to be used to communicate proposed future traffic changes to affected road users, pedestrians and cyclists, consistent			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	with the Community Communication Strategy required under condition C1; (x) an adaptive response plan which sets out a process for response to any traffic, construction or other incident; and (xi) mechanisms for the monitoring, review and amendment of this plan. (b) a **Construction Noise and Vibration Management Plan** to detail how construction noise and vibration impacts will be minimised and managed. The Plan shall be consistent with the guidelines contained in the *Interim Construction Noise Guidelines* (Department of Environment and Climate Change 2009). The plan shall be developed in consultation with the EPA and shall include, but not be limited to: (i) identification of the work areas, site compounds and access points; (ii) identification of sensitive receivers and relevant construction noise and vibration goals applicable to the SSD and stipulated in the conditions above; (iii) details of Early Works activities and an indicative schedule for works, including the identification of key noise and/or vibration generating construction activities (based on representative construction scenarios, including at ancillary facilities) that have the potential to generate noise and/or vibration impacts on surrounding sensitive receivers, particularly residential areas; (iv) an **Out-of-Hours Work Protocol** for the assessment, management and approval of works outside of standard construction hours as defined in condition D5 of this approval, for the Secretary's approval. The Out-of-Hours Work Protocol must detail: a) assessment of out-of-hours works against the relevant noise and vibration criteria; b) detailed mitigation measures for any residual impacts (that is, additional to general mitigation measures), including extent of at receiver treatments; and c) proposed notification arrangements. (v) identification of feasible and reasonable measures proposed to be implemented to minimise and manage noise impacts (including construction traffic noise impacts), including, but not limited to, acoustic enclosures, erection of noise walls (hoardings) and respite periods; (vi) identification of feasible and reasonable procedures and mitigation measures to ensure relevant vibration criteria are achieved, including			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	applicable buffer distances for vibration intensive works, use of low vibration generating equipment/ vibration dampeners or alternative construction methodology, and pre- and post- construction dilapidation surveys of sensitive structures where blasting and/ or vibration is likely to result in damage to buildings and structures (including surveys being undertaken immediately following a monitored exceedance of the criteria); (vii) a description of how the effectiveness of mitigation and management measures would be monitored during the Early Works, clearly indicating how often this monitoring would be conducted, the locations where monitoring would take place, how the results of this monitoring would be recorded and reported, and, if any exceedance is detected, how any noncompliance would be rectified; and (viii) mechanisms for the monitoring, review and amendment of this plan. (c) a **Construction Heritage Management Plan** to ensure construction impacts on Aboriginal and non-Aboriginal heritage will be appropriately avoided, minimised and managed. The Plan shall be developed in consultation with OEH, the relevant Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and the relevant Local Aboriginal Land Councils (for Aboriginal heritage), and include, but not necessarily be limited to: (i) in relation to Aboriginal Heritage: a) details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation of sites and items; b) procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures, including when works can re-commence, by a suitably qualified and experienced archaeologist in consultation with the Secretary and Aboriginal stakeholders, assessment of the consistency of any Aboriginal heritage impacts against the approved impacts of the SSD, and, where relevant, registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register;			

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	c) procedures for dealing with human remains, including cessation of works in the vicinity, notification of Secretary, NSW Police Force, OEH and Aboriginal stakeholders, and commitment to cease recommencing any works in the area unless authorised by the OEH and/or the NSW Police Force; d) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this approval including site identification, protection and conservation of Aboriginal cultural heritage; and e) procedures for ongoing Aboriginal consultation and involvement for the duration of the Early Works; and (ii) in relation to non-Aboriginal Heritage: a) identification of heritage Items directly and indirectly affected by the Early Works; b) consideration of methods to prevent damage to any retained heritage items, including: I. procedures for identifying minimum working distances to retained heritage items (including, at minimum, vibration testing and monitoring), II. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and III. commitment to implementing those options if preferred values for vibration are likely to be exceeded; c) details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity); d) details of monitoring and reporting requirements for impacts on heritage items; e) procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified and			

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	experienced archaeologist in consultation with the OEH, NSW Heritage Council and the Secretary, assessment of the consistency of any heritage impacts against the approved impacts of the SSD, and, where relevant, notification of the Heritage Council of NSW in accordance with section 146 of the *Heritage Act 1977*; and f) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under this approval including site identification, protection and conservation of non-Aboriginal cultural heritage; and (iii) mechanisms for the monitoring, review and amendment of this plan. (d) **a Construction Flora and Fauna Management Plan** to detail how impacts on ecology will be minimised and managed. The Plan shall be developed by a suitably qualified and experienced ecologist and in consultation with the OEH, and shall include, but not necessarily be limited to: (i) plans for impacted and adjoining areas showing vegetation communities; important flora and fauna habitat areas; locations where threatened species, populations or ecological communities have been recorded; including preclearing surveys to confirm the location of threatened flora and fauna species and associated habitat features; (ii) the identification of areas to be cleared and details of management measures to avoid residual habitat damage or loss and to minimise or eliminate time lags between the removal and subsequent replacement of habitat such as: a) clearing minimisation procedures (including fencing), b) clearing procedures (including nest box plan), c) removal and relocation of fauna during clearing, d) habitat tree management, and e) construction worker education; (iii) rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas; (iv) a **Weed Management Strategy,** incorporating weed management measures focusing on early identification of invasive weeds and effective management controls (including for those related to aquatic and riparian zones);			

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	(v) a description of how the effectiveness of these management measures would be monitored; (vi) a procedure for dealing with unexpected EEC/ threatened species identified during construction, including cessation of work and notification to the OEH and DPI Fisheries, determination of appropriate mitigation measures in consultation with the OEH and DPI Fisheries (including relevant re-location measures) and updating of ecological monitoring and/ or biodiversity offset requirements; and (vii) mechanisms for the monitoring, review and amendment of this plan. (e) a **Construction Air Quality Management Plan** to detail how impacts on local air quality will be minimise and managed. The Plan shall be developed in consultation with the EPA, and shall include, but not necessarily be limited to: (i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants; (ii) key performance indicators for local air quality during construction; (iii) details of monitoring methods, including location, frequency and duration of monitoring; (iv) mitigation measures to minimise impacts on local air quality; (v) procedures for record keeping and reporting against key performance indicators; (vi) provisions for implementation of additional mitigation measures in response to issues identified during monitoring and reporting; and (vii) mechanisms for the monitoring, review and amendment of this plan. (f) a **Construction Soil and Water Management Plan** to manage surface and groundwater impacts during Early Works. The plan shall be developed in consultation with, EPA, DPI Water, DPI Fisheries, and relevant Councils, and include, but not necessarily be limited to: (i) details of construction activities and their locations, which have the potential to impact on water courses, storage facilities, stormwater flows, and groundwater, including identification of all pollutants that may be introduced into the water cycle; (ii) potential impacts on watercourse bank stability and the development of appropriate mitigation measures as required; (iii) an **Acid Sulfate Soils Management Plan,** if required, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas, should the project impact on acid sulfate soils;			

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	(iv) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, how the results of the monitoring would be recorded and reported, and, if any exceedance of the criteria is detected how any non-compliance can be rectified; and (v) mechanisms for the monitoring, review and amendment of this plan.			

Appendix B: Updated Independent Audit Declaration Forms

Independent Audit Declaration Form

Independent Audit Declaration Form

Project name	Moorebank Intermodal Precinct West
Consent Number	5066
Description of Project	Construction and operation of an intermodal logistics facility
Project Address	Moorebank Avenue, Moorebank NSW 2170
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	27/06/2019

I declare that I:

- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit;
    - **I declare to the Department prior to the audit, that I have been engaged to prepare the Audit Program for the project.**
- I am not the Environmental Representative for the project; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of auditor	Derek Low
Signature	
Qualification	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

Independent Audit Declaration Form

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- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit;
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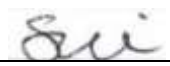
b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of auditor	Steve Fermio
Signature	
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